

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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**In re: BAIR HUGGER FORCED AIR  
WARMING DEVICES PRODUCTS  
LIABILITY LITIGATION**

**MDL No 15-2666 (JNE/FLN)**

**AFFIDAVIT OF DAN GREWE**

This Document Relates to:  
All Actions

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1. My name is Dan Grewe. I am an employee of Augustine Temperature Management LLC, and I am involved with the other Augustine entities. I have held several positions with Augustine over the years, but my responsibilities generally involve product management, sales and marketing.
2. The facts contained herein are within my personal knowledge (except when stated as being on information and belief) and are true and correct.
3. Shortly after we were served with document discovery General Counsel J. Randall Benham informed me of our obligation to preserve responsive documents. To the best of my knowledge all responsive documents have been preserved appropriately.
4. At the request of Mr. Benham, I reviewed my files and the files of my previous colleague, Elaina Reinke, in search of marketing communications, blogs, social media posts, etc regarding the safety, effectiveness and performance of forced-air warming devices such as 3M's Bair Hugger. I delivered such documents to Mr. Benham, and it is my understanding that he produced them to 3M's counsel.

5. I generally discussed with Mr. Benham other document demands from 3M's counsel, including emails to various persons and entities. While I do not recall exactly what I produced, I am confident that I produced whatever I found.

FURTHER AFFIANT SAYETH NOT



11/8/16

Dan Grewe